1		District Judge Lauren King
2		
3		
4		
5		
6		
7 8	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
9	STATE OF WASHINGTON, et al.,	
10	Plaintiffs,	CASE NO. 2:25-cv-00244-LJK NOTICE
11	V.	
12	DONALD J. TRUMP, in his official capacity as President of the United States, <i>et al.</i> ,	
13	Defendants.	
14		
15	<u>N</u> 0	<u>OTICE</u>
16	1. Defendants hereby provide notice to	the Court of a Memorandum issued by the Attorney
17	General of the United States. Att'y G	Gen., U.S. DEP'T OF JUSTICE, Preventing the
18	Mutilation of American Children (Ap	or. 22, 2025), Ex A.
19	2. Section I of the memorandum, entitle	ed "Enforcement of Laws Outlawing Female Genital
20	Mutilation," directs "all U.S. Attorne	eys to investigate all suspected cases of FGM [female
21	genital mutilation]—under the banne	er of so-called 'gender-affirming' care or otherwise—
22	and to prosecute all FGM offenses to	the fullest extent possible." Memorandum at 3–4.
23	3. The memorandum does not change the	ne statutory definition of "female genital
24 24	Notice 2:25-cv-00244-LK - 1	U.S. DEPARTMENT OF JUSTICE CIVIL DIVISION, FEDERAL PROGRAMS BRANCH 1100 L STREET, NW WASHINGTON, DC 20005

202-305-0845

1	mutilation." See 8 U.S.C. § 116(e). Nor does the memorandum remove the statutory
2	exclusion for "a surgical operation" that is "necessary to the health of the person on
3	whom it is performed, and is performed by a person licensed in the place of its
4	performance as a medical practitioner." <i>Id.</i> § 116(b)(1).
5	
6	
7	
8	DATED this 25 <sup>th</sup> day of April, 2025.
9	Respectfully submitted,
	YAAKOV M. ROTH
10	Acting Assistant Attorney General Civil Division
11	MICHELLE BENNETT
12	Assistant Branch Director
13	<u>/s/ Vinita B. Andrapalliyal</u> VINITA B. ANDRAPALLIYAL
14	Senior Counsel CHRISTIAN S. DANIEL
15	Trial Attorney ROBERT C. BOMBARD
16	Trial Attorney
17	United States Department of Justice Civil Division, Federal Programs Branch
18	1100 L Street NW Washington, DC 20530
19	Tel.: (202) 305-0845 vinita.b.andrapalliyal@usdoj.gov
20	christian.s.daniel@usdoj.gov robert.bombard2@usdoj.gov
21	Tee of weetheur u.z. (w) usu of ige i
22	<sup>1</sup> The statute defines "female genital mutilation" as "any procedure performed for non-medical reasons that involves partial or total removal of, or other injury to, the external female genitalia" and
23	provides examples. 18 U.S.C. § 116(e).  Notice  U.S. DEPARTMENT OF JUSTICE

24

2:25-cv-00244-LK - 2

U.S. DEPARTMENT OF JUSTICE
CIVIL DIVISION, FEDERAL PROGRAMS BRANCH
1100 L STREET, NW
WASHINGTON, DC 20005
202-305-0845

1	Attorneys for Defendants
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24   	Notice 2:25-cv-00244-LK - 3 U.S. DEPARTMENT OF JUSTICE CIVIL DIVISION, FEDERAL PROGRAMS BRANCH 1100 L STREET, NW WASHINGTON, DC 20005 202-305-0845